

REMARKS/ARGUMENTS

The non-final Office Action of June 14, 2005, has been carefully reviewed and the following remarks are responsive thereto. Applicant's undersigned representative is new counsel of record pursuant to the new Power of Attorney filed on November 14, 2005. Applicant herein cancels claims 1-47 and presents new claims 48-94. No new matter has been added. Claims 48-94 remain pending after entry of this amendment. Entry of this amendment and allowance of the application are respectfully requested.

Renumbering of Claims

Applicant thanks the Examiner for identifying the error in claim numbering (i.e., claims 39-48 should have been numbered 38-47). In view of Examiner's correction of the numbering, the newly added claims are presented as claims 48-94.

Claim Rejections

Claims 1, 2, 4-11, 39 and 46 stand rejected under 35 U.S.C. §102(e) as being anticipated by Scott *et al.* (U.S. Patent No. 6,484,260, hereinafter "Scott"). Claim 3 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Scott. Claims 12-32, 40-45, 45 and 47 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Scott in view of Rosen (U.S. Patent No. 6,175,921). Claim 44 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Scott in view of Rosen and further in view of Barlow *et al.* (U.S. Patent No. 6,038,551, hereinafter "Barlow"). Since Applicant has cancelled claims 1-47, these rejections are rendered moot. However, to expedite prosecution, Applicant addresses the applied references in the discussion of new claims 48-94 below.

New Claims

New claims 48, 59, 80, 86, 92 and 93 relate to, *inter alia*, electronic tickets generated by a grantor key device and transmitted to a receiving key device for providing the receiving key device authorization to unlock an electronic lock. Additionally, the electronic tickets store a public key corresponding to the receiving key device so that a lock device may authenticate the receiving key device prior to disengaging the lock device's locking mechanisms. None of the

applied references, either separately or in combination, teaches or suggests such a feature. For example, Scott merely discloses verifying a user or key by encoding a random signal generated by a host facility using a private key and decrypting the encrypted random signal using a corresponding public key. Col. 3, ll. 20-63. Scott fails to teach or suggest the granting of authorization by one key device to another key device using a ticket. Rosen, on other hand, discloses decryption tickets generated by a merchant trusted agent and delivered to a customer trusted agent for unlocking a purchased item. Col. 4, line 51 – Col. 5, line 54. The trusted agents are employed to achieve a secure exchange of payment for the electronic merchandise. Col. 4, ll. 4-14. However, Rosen still lacks any teaching or suggestion of storing a public key of the receiving key device (e.g., the customer trusted agent) in the ticket so that the lock device (e.g., purchased object) can authenticate the receiving key device. In fact, Rosen does not even suggest that a receiving key device needs to be authenticated with the purchased object. In view of the above, both Rosen and Scott fail teach or suggest storing a public key of a receiving key device in an electronic ticket generated by a grantor key device, wherein the public key is used by a lock device to authenticate the receiving key device prior to disengaging one or more locking mechanisms of the lock device.

Even viewed together, there is no suggestion or motivation in either Rosen or Scott to combine the references in the manner recited in the above-referenced claims. As stated previously, Scott does not even pertain to transferring or granting authorization to a lock device. The Office Action, on pp. 8-9, asserts that Scott discloses a first user granting access authority to a second user. However, such an assertion represents a misunderstanding of the cited passages. The terms “first user signal” and “second user signal” in col. 3, ll. 5-19 merely relate to a first signal and a second signal of the same user, not a first and second signal corresponding to a first user and a second user as the Office Action suggests. Thus, Scott lacks any teaching or suggestion of a first key device granting a second key device authorization to open a lock device. As such, Scott would not have been motivated to use the ticket features of Rosen in the manner suggested by claims 48, 59, 80, 86, 92 and 93 (i.e., to authorize a second key device to unlock a lock device using a transmitted ticket).

Similarly, Rosen would also not have been motivated to incorporate the features of Scott. Rosen discloses using trusted agents to generate a decryption ticket and for unlocking purchased

objects. Col. 4, ll. 41-50. More particularly, the customer trusted agent plays no part in the unlocking of the lock device beyond applying the decryption ticket. Col. 4, ll. 4-14. In other words, all the information used to decrypt the ticket's associated object is stored within the ticket itself. Col. 6, ll. 3-13. As such, there would be no motivation to authenticate a receiving key device (i.e., the customer trusted agent) by storing a public key corresponding to the receiving key device in the ticket in Rosen. Accordingly, any alleged combinations of Rosen and Scott would be a result of impermissible hindsight using Applicant's invention as a blueprint.

Additionally, Barlow relates to a management system for managing resources on an integrated circuit card. As such, even if combined with Scott or Rosen, the combinations would not result in the invention as described in claims 48, 59, 80, 86, 92 and 93. Claims 48, 59, 80, 86, 92 and 93 are thus allowable for at least this reason over the cited references.

Claims 49-58, 60-79, 81-85, 87-91 and 94 are dependent on their respective base claims (i.e., claims 48, 59, 80, 86, 92 and 93) and are thus allowable for at least the same reasons as those base claims and further in view of the novel and non-obvious features recited therein.

CONCLUSION

All rejections having been addressed, applicant respectfully submits that the instant application is in condition for allowance, and respectfully solicits prompt notification of the same. The Office is hereby authorized to charge any fees due, including a three month extension of time fee, to Deposit Account 19-0733. If for any reason the Examiner believes the application is not in condition for allowance or there are any questions, the examiner is requested to contact the undersigned at (202) 824-3153.

Respectfully submitted,
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